



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JUN YUN ZHANG,
aka "Lao Sze," "Michael,"
JUN YUE ZHANG,
aka "Lao San,"
JUN XI ZHANG,
aka "Lao Wu"
JUN SHUN ZHANG,
aka "Mikey,"
DONG DONG GUO,
aka "Xiao Zhang,"
TIANSHENG ZHANG,
XIN LI WANG
aka "Tony,"
MEIZHU WANG
WENYUAN ZHOU,
YONGHUI WANG,
ZHAOFA WANG,
QIONG ZHOU,
TIMOTHY T. JOHNSON JR.,
JAMES M. HOWELL, and
ZHI YUN LI

No. 09 CR 154

Judge Michael T. Mason

PROTECTIVE ORDER RELATING TO DISCOVERY

Upon the government's motion for a protective order, it is hereby ORDERED as follows:

1. All materials produced by the government in preparation for, or in connection with, any stage of the proceedings in this case, including but not limited to: grand jury transcripts; agency and police department reports; recorded conversations; witness and victim statements and memoranda of interview; immigration records; financial institution records; and telephone service provider records; and any documents and tangible objects produced by the government, shall remain the

property of the United States. Upon conclusion of the trial and any appeals of this case or upon the earlier resolution of charges against the defendant, all such materials and all copies made thereof shall be returned to the United States or destroyed, unless otherwise ordered by the Court. All copies withheld by the defense by express order of this Court shall be preserved only so long as is necessary for further proceedings related to this case, after which they shall be returned to the United States or destroyed. The Court may require a certification as to the disposition of any such materials.

2. All materials provided to the defense by the United States may be utilized by the defendant and his or her counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceedings. The materials and their contents shall not be disclosed either directly or indirectly to any person or entity other than the defendant, defendant's counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure. Any notes or records of any kind that defense counsel or the defendant may make in relation to the contents of materials provided by the government shall not be disclosed to anyone other than the defendant, defendant's counsel, and persons employed to assist the defense, or such other persons as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

3. The materials shall not be copied or reproduced except so as to provide copies of the materials for the use by each defense lawyer and defendant and such persons as are employed to assist in the defense, and such copies and reproductions shall be treated in the same manner as the original matter.

4. The restrictions set forth in this order do not apply to documents that are public record, including but not limited to, trial transcripts, documents, recordings, or other materials that have been received in evidence at this or other trials; or documents that are otherwise in the public domain.

ENTER:-

A handwritten signature in black ink, appearing to read "Michael T. Mason", written over a horizontal line.

Michael T. Mason
United States Magistrate Judge

Date

July 1, '09